***Inleiding: EU-rechtelijke aspecten van een EU-sanctieregime***

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Institutional and legal innovation of the horizontal EU Global Human Rights Sanctions Regime

* Decoupling of the protection of human rights from specific (political) conflicts, different from how HR protection is currently taking place under 18 geographically limited regimes.
* Greater flexibility in targeting non-state actors, militia, without having to set up additional legal frameworks
* Greater speed and coherence through more centralization because of the leading roles of High Representative, the European External Action Service, and the Commission

Legal Requirements under EU law and the case law of the European Court of Justice

* Objective - accountability; justice; signaling value?
* Designation criteria - broad discretion; presumptions; association with HR violators?
* Delisting criteria - periodical review; limitation clauses; and the unlikely case of a change of behaviour?
* Open source information - must be made available to court and those listed; reliability?
* Evidentiary threshold - remains undefined by the CJEU; ‘reason to believe’; ‘reasonable grounds to suspect’?

Points of Attention: Legal framework and Listing practice

* Alignment with EU foreign policy - listing is also a political choice
* Vague (general) listing requirements have not been criticized by the CJEU
* Broad criteria lead to less annulments - what limit imposes the rule of law, legal certainty?
* Hundreds of specific listing decisions have been annulled by the CJEU, in most cases for violation of procedural rights - reputational damage
* Multiple listings for one violation - e.g., the case of Alexei Navalny